

1 Michael Kind, Esq. (SBN: 13903)
2 KAZEROUNI LAW GROUP, APC
3 7854 W. Sahara Avenue
4 Las Vegas, NV 89117
5 Phone: (800) 400-6808 x7
6 FAX: (800) 520-5523
7 mkind@kazlg.com

8
9 David H. Krieger, Esq. (SBN: 9086)
10 HAINES & KRIEGER, LLC
11 8985 S. Eastern Avenue, Suite 350
12 Henderson, Nevada 89123
13 Phone: (702) 880-5554
14 FAX: (702) 385-5518
15 dkrieger@hainesandkrieger.com
16 *Attorneys for Plaintiff*

17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

<p>David Corral, v. CACH, LLC,</p> <p style="text-align: center;">Plaintiff, Defendant.</p>	<p>Case No: 2:16-cv-01742-JAD-CWH Stipulation for Plaintiff to Amend the Complaint</p> <p style="text-align: center;">ORDER</p>
---	---

STIPULATION

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff David Corral (“Plaintiff”) and Defendant CACH, LLC (“Defendant”) (jointly as the “Parties”), by and through their respective counsel, hereby submit this stipulation for Plaintiff to file a First Amended Complaint, attached hereto as Exhibit A, pursuant to Local Rule 15-1.

WHEREAS, Plaintiff filed his Complaint on July 22, 2016, ECF No. 1;

WHEREAS, on August 30, 2016, Defendant filed its Answer to the Complaint, ECF No. 4;

WHEREAS, the deadline to amend pleadings is on November 28, 2016, ECF No. 8, p. 2, ¶ 2.

WHEREAS, Plaintiff seeks to amend his Complaint to include further allegations that Defendant recently violated the FDCPA;

WHEREAS, in good faith and in order to avoid unnecessary motion practice, Defendant has agreed to allow Plaintiff to amend the Complaint but reserves all rights as to any allegations in the Complaint;

WHEREAS, in stipulating to allow Plaintiff to amend the Complaint, Defendant does not hereby admit any of the allegations in the Complaint;

111

111

111

111

111

111

111

111

111

111

1 NOW, THEREFORE, in consideration of the foregoing, and for good cause,
2 IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as
3 follows:

4 (1) Plaintiff shall file and serve the Amended Complaint attached hereto as
5 Exhibit A promptly after this Court has entered an Order approving this
6 Stipulation.
7 (2) Defendant shall file and serve its response to the Amended Complaint
8 within 14 days after Plaintiff files the Amended Complaint.

9 DATED this 21st day of November 2016.

10 Respectfully Submitted,

11 **KAZEROUNI LAW GROUP, APC**

12 By: /s/ Michael Kind
13 Michael Kind, Esq.
14 7854 W. Sahara Avenue
15 Las Vegas, NV 89117
16 *Attorneys for Plaintiff*

17 **LEWIS ROCA ROTHGERBER CHRISTIE LLP =**

18 By: /s/ J. Christopher Jorgensen
19 J. Christopher Jorgensen
20 3993 Howard Hughes Parkway, Suite 600
21 Las Vegas, NV 89169
22 *Attorneys for CACH, LLC*

23 IT IS SO ORDERED:

24
25
26 
27 UNITED STATES DISTRICT JUDGE
28 DATED: November 21, 2016